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Attorneys for Plaintiff RANJIT SODHI

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

RANJIT SODHI,

Plaintiff,

vs.

GRASSHOPPER HOUSE LLC, *et al.*,

Defendants.

Case No.: CV09-08927-GHK-VBKx

**DECLARATION OF MICHAEL
TRACY RE STATUS OF CASE**

Conference: April 19, 2010 1:30PM

I, Michael Tracy, declare as follows:

1. I am an attorney admitted to the bar of this Court. If called as a witness, I could and would testify to the following of my own personal knowledge.
2. Mediation in this matter was conducted on May 18, 2010.
3. No settlement was reached at the mediation, however, the parties had put together a framework in which certain documents were to be reviewed and produced to Plaintiff.
4. Defendants failed to produce the records and failed to provide a summary of what the records would have shown.

1 5. In general, counsel for Defendants has stopped responding in this case. I had
2 requested that he contact me to discuss the status of this case and he has not
3 responded to my calls of fax.

4 6. As such, Plaintiff intends to continue to litigate the case, as it appears that
5 settlement will not happen at this time.

6 7. Plaintiff intends to file a motion for collective action and class action
7 certification within 45 days. Plaintiff also intends to file a motion to amend
8 this complaint to remove exclusively California claims as soon as these claims
9 are brought in State Court.

10 8. Plaintiff intends to file an *ex parte* application to be relieved of the meet and
11 confer requirements of Local Rule 7-3 based on the fact that Defendant's
12 counsel is not responding in this case.

13
14 I declare under penalty of perjury under the laws of the United States that the
15 foregoing to true.

16 Executed: August 4, 2010 in the city of Irvine, CA

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18 /s/ Michael Tracy
19 By: _____
20 Michael Tracy
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